

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
ENERGY FACILITY SITING BOARD

In re: The Narragansett Electric Company :  
(L190 115kV Transmission Line : Docket No. SB-  
Asset Condition Refurbishment Project :  
East Greenwich, North Kingstown, Exeter, :  
and South Kingstown, Rhode Island) :

Notice of Intent Application of  
The Narragansett Electric Company

Counsel:

George W. Watson, III  
Robinson & Cole LLP  
One Financial Plaza, 14<sup>th</sup> Floor  
Providence, RI 02903  
(401) 709-3351

June 17, 2022

TABLE OF CONTENTS

	<u>Page</u>
<b>INTRODUCTION</b> .....	1
1. Identification of the owner(s) of the facility .....	2
2. Detailed description of the proposed facility .....	2
3. Detailed description and analysis of the impact of the Project on the physical and social environment .....	4
4. All studies and forecasts which demonstrate the need for the proposed facility .....	4
5. The reasons why the Project does not constitute the alteration of a major energy facility .....	4
<b>CONCLUSION</b> .....	5

## INTRODUCTION

The Narragansett Electric Company (“TNEC” or “Company”), with a principal place of business at 280 Melrose Street, Providence, Rhode Island 02907, hereby submits this Notice of Intent Application to the Energy Facility Siting Board (the “Board” or “EFSB”) for approval of the refurbishment of an existing transmission line within the State of Rhode Island, pursuant to the applicable provisions of Rhode Island General Laws §§ 42-98-1, et seq. and the Board’s Rules of Practice and Procedure, as amended (the “EFSB Rules”).

This Application is filed by TNEC pursuant to Rule 1.6(F) of the EFSB Rules which provides an abbreviated review for (i) the construction of power lines of more than 1,000 feet but less than 6,000 feet or (ii) the modification or relocation of power lines. As noted in Rule 1.3(A)(4), “‘modification’ includes reconductoring and rebuilding an existing power line.” Rule 1.6(F) provides for an abbreviated application, a public hearing “in one or more of the cities or towns affected by [the] application,” and a determination within sixty (60) days of the filing as to “whether the project may result in a significant impact on the environment or the public health, safety and welfare,” thereby requiring a full EFSB review. (See EFSB Rules 1.6(F), (G), and (H)). If the Board does not find that the project may result in a significant impact on the environment or the public health, safety and welfare, the project does not constitute an “alteration” and the project may proceed without further review. (See EFSB Rules 1.2(D) and 1.6(F)).

TNEC is proposing to refurbish an approximately 14-mile section of the existing L190 115 kV transmission line (“L190 Line” or “Line”) in East Greenwich, North Kingstown, Exeter, and South Kingstown, Rhode Island (the “Project”). The Project is referred to as a “refurbishment” because the need is driven by the asset conditions of the supporting structures

and conductors which were originally installed in the 1960s. The Project is jurisdictional to the EFSB because the “normal carrying capacity of the line” is increasing. The increase is due, in part, to the Line being rebuilt to meet current electric safety code and industry standards but it also due to Line being upgraded to address thermal overloads that were identified in the ISO-New England Inc.’s (ISO-NE) Eastern Connecticut (ECT) 2029 Need Assessment. The Project will occur within the existing L190 Line right-of-way (“ROW”) that is located in the towns of East Greenwich, North Kingstown, Exeter, and South Kingstown. The proposed Project will include: (1) replacing approximately 146 existing single-circuit wood pole H-frame and 3-pole structures with primarily weathering steel pole equivalent structures for approximately 12.5 miles; (2) reconductoring with new single 795 kcmil “Drake” ACSS conductor and replace the existing shield wire with Optical Ground Wire (OPGW) along 200 feet; (3) replacing existing shield wire with OPGW; and (4) maintaining and upgrading access roads, signage, and grounding to the latest TNEC standards, as applicable.

In this Application, TNEC requests the Board’s approval of the Project. TNEC is filing herewith and incorporates herein a Siting Report entitled “L190 Asset Condition Refurbishment Project June 2022” (the “Siting Report”). This application follows the organization of Rule 1.6(F) and identifies the sections of the Siting Report where the issues identified in the EFSB Rules are discussed.

1. Identification of the owner(s) of the facility.<sup>1</sup>

- a. The owner of the facility is The Narragansett Electric Company, a Rhode Island chartered public utility, with its principal place of business at:

---

<sup>1</sup> EFSB Rule 1.6(F)(1) requires the applicant to provide identification of the owner(s) of the facility, including identification of all affiliates of the proposed owners, as such term is defined in R.I.G.L. §39-3-27.

280 Melrose Street  
Providence, RI 02907

b. The affiliates of The Narragansett Electric Company include its parent, PPL Rhode Island Holdings, LLC, PPL Energy Holdings, LLC, PPL Subsidiary Holdings, LLC, and PPL Corporation (“PPL”). The corporate relationships for the Company are shown on Exhibit 1, attached. A listing of PPL owned affiliates is available upon request.

2. Detailed description of the proposed facility.<sup>2</sup>

The Project is the 14-mile portion of the L190 Line between the Davisville Tap in East Greenwich and the West Kingston Substation in South Kingstown. This portion of the Line passes through the towns of East Greenwich, North Kingstown, Exeter, and South Kingstown. The purpose of the Project is to address the asset conditions of the structures and conductors and to address the thermal overloads identified in ISO-NE’s Eastern Connecticut (ECT) 2029 Need Assessment. The Project activities include structure replacements, reconductoring the Line and replacing the shield wire. The Project will include overhead maintenance, grading to provide adequate workspace for Project activities, and reestablishing pre-existing access roads where required to safely access the ROW.

The Project is described in more detail in Section 3.0 of the Siting Report.

---

<sup>2</sup> EFSB Rule 1.6(F)(2) requires the applicant to provide a detailed description of the proposed facility, including its length, route, function and operating characteristics, and complete plans as to all structures associated with the proposed facilities.

3. Detailed description and analysis of the impact of the Project on the physical and social environment.<sup>3</sup>

The environmental characteristics of the Project area are described in Section 5.0 of the Siting Report and the affected social environment is discussed in Section 6.0. The impact of the Project on the natural and social environments is described in Section 7.0 of the Siting Report. A review of current health research pertaining to electric and magnetic fields is included as Appendix A of the Siting Report. The existing and projected levels of electric and magnetic fields at the edges of the ROW are provided in §§7.13.1 of the Siting Report.

4. All studies and forecasts which demonstrate the need for the proposed facility.<sup>4</sup>

The need for the Project is described in Section 2 of the Siting Report.

5. The reasons why the Project does not constitute the alteration of a major energy facility.

Transmission lines of 69 kV and above are included in the definition of “major energy facility” in Rule 1.3(A)(16) of the EFSB Rules. However, Rule 1.3(A)(4) states that

the modification<sup>5</sup> or relocation of an existing power line shall not be an alteration unless the Board determines that the project may result in a significant impact on the environment or the public health, safety and welfare. [Emphasis added.]

Thus, the Project would constitute the alteration of a major energy facility and be subject to the full EFSB permitting process only if the Board determines that it “may result in a significant impact on the environment or the public health, safety and welfare.”

---

<sup>3</sup> EFSB Rule 1.6(F)(3) requires the applicant to provide a “[d]etailed description and analysis of the impact of the Project on the physical and social environment. The applicant shall also provide a review of the current independent scientific research pertaining to electromagnetic fields (“EMF”) and shall provide data on the anticipated levels of EMF exposure and potential health risks associated with this exposure. To the extent the proposed Project will have only negligible impact on any particular resource in the natural and social the applicant may so state and need not provide a detailed analysis of the baseline conditions for that resource.”

<sup>4</sup> EFSB Rule 1.6(F)(4) requires the applicant to provide all studies and forecasts which demonstrate the need for the proposed facility under the statewide master construction plan submitted annually.

<sup>5</sup> Per EFSB Rule 1.3(A)(4), modification “includes reconductoring and rebuilding an existing power line.”

As explained in Section 3 of the Siting Report, the Project involves refurbishing the existing L190 Line. The impacts of the Project are discussed in Section 7.0 of the Siting Report and summarized in Sections 7.1 and 7.2. The mitigation measures are discussed in Section 8.0 of the Siting Report. In summary, any impact to environmental resources and the social environment will be negligible. Consequently, because the Project does not significantly impact the environment or the public health, safety and welfare, the Board should determine that the Project does not constitute an alteration and is not subject to the full EFSB permitting process.

### CONCLUSION

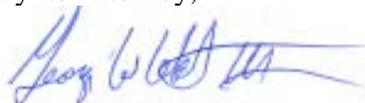
This Application and the Siting Report, which is filed herewith and incorporated herein, and the other supporting material clearly demonstrate that the proposal to refurbish the existing L190 115 kV Transmission Line will not result in a significant impact on the environment or the public health, safety and welfare.

For the reasons stated herein, The Narragansett Electric Company requests that the Energy Facility Siting Board approve the Project as described herein pursuant to EFSB Rule 1.6(F).

Respectfully submitted,

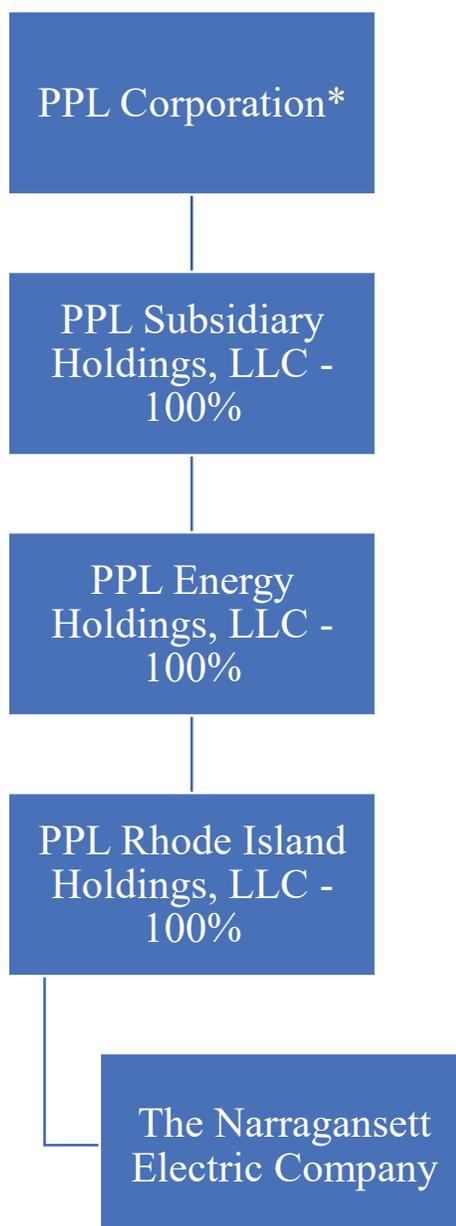
THE NARRAGANSETT ELECTRIC COMPANY

By its Attorney,



---

George W. Watson, III  
Robinson & Cole LLP  
One Financial Plaza, 14<sup>th</sup> Floor  
Providence, RI 02903  
(401) 709-3351

**Organization Chart – The Narragansett Electric Company – June 2022**

\* Other subsidiaries of PPL Corporation are omitted.